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Counsel for Defendant Odom

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CAMERON ODOM,

Defendant.

Case No.: CR 21–00259 JST

**DECLARATION OF JOYCE LEAVITT
IN SUPPORT OF DEFENDANT’S
REPLY TO MOTION TO SUPPRESS
EVIDENCE**

Court: Courtroom 6, 4th Floor
Hearing Date: January 7, 2022
Hearing Time: 2:00 p.m.

I, Joyce Leavitt, declare the following:

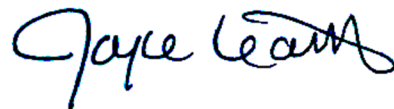
1. I am an Assistant Federal Public Defender appointed to represent defendant Cameron Odom in this case.
2. Attached as Exhibit 1 to this declaration are true and correct copies of documents provided by the government in discovery in this case. These documents are:
 - (1) District Attorney Disposition Report (Bates 5);
 - (2) Body Worn Camera/Dashcam Video Report (Bates 6);
 - (3) Booking Fee Reimbursement (Bates 7);

- (4) apparent DMV records check for Mr. Odom (Bates 8);
- (5) Probable Cause for Warrantless Arrest (Bates 10);
- (6) apparent CRIMS report for Mr. Odom (Bates 11);
- (7) apparent CLETS report for Mr. Odom (Bates 15);
- (8) CHP Arrest - Investigation Report (Bates 19);
- (9) Consolidated Arrest Report (Bates 28);
- (10) Prison Property Receipt (Bates 29);
- (11) apparent DMV report for BMW Mr. Odom was driving (Bates 30);
- (12) Vehicle Report (Bates 32);
- (13) Incident Detail Report (Bates 33).

3. Submitted separately today as Exhibit 2 is a true and correct copy of a CHP dispatch audio recording provided by the government in discovery (Bates 85).
4. From conversations with my investigator, I understand that, on the Incident Detail Report the government provided in discovery (Bates 33), "1015" is the code for a suspect in custody; "1029," or "29," is the code for requesting a computer check on a person, vehicle or object; and "1127" is the code for a request to run a driver's license number.
5. From conversations with my investigator, I understand that, because CRIMS is an Alameda-County-specific database, a CRIMS check would turn up warrants only from Alameda County, not from any other county. It also is my understanding that CHP officers would have access to the CLETS state-wide database through their MDCs. Using CLETS would allow officers to search for outstanding warrants throughout the state.

I declare under the penalty of perjury that the foregoing is true and correct.

Executed on November 19, 2021, in Oakland, California.



JOYCE LEAVITT